

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION CITY VIEW PLAZA, SUITE 7000 #48 165 RD. KM 1.2 GUAYNABO, PR 00968-8069

JUN 1 0 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article Number: 7009 2250 0000 9163 5300

Noelia Y. Rosa Jaime

Director

Environmental Compliance and Planning Office

Autonomous Municipality of San Juan

P.O. Box 70179

San Juan, Puerto Rico 00936-8179

Irma López Director

Compliance and Quality Control Directorate

Puerto Rico Aqueduct and Sewer Authority

P.O. Box 7066

San Juan, Puerto Rico 00916-9990

Re: Reconnaissance Inspection within the Autonomous Municipality of San Juan (MSJ) and Puerto

Rico Aqueduct and Sewer Authority (PRASA) Collection Systems.

Autonomous Municipality of San Juan (MSJ) MS4 (PRR040036)

Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment

Plant Collection System (PR0021555)

Dear Mrs. Rosa and López:

On June 2, 2015, the United States Environmental Protection Agency's (EPA) Region 2, Caribbean Environmental Protection Division (CEPD) inspector Alex Rivera of my staff conducted a reconnaissance inspection of the Puerto Rico Aqueduct and Sewer Authority (PRASA) wastewater collection system and the Municipality of San Juan (MSJ) MS4 located in Venezuela Community in San Juan, Puerto Rico.

The inspection was conducted pursuant to the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. 1251 et seq., 40 CFR 122.41(a)(2), & (i) 1,2,3 and in accordance with Agency wide acceptable guidance and procedures. The findings are included in the Water Compliance Inspection Report enclosed. The results of the inspection performed by EPA found PRASA's and MSJ's collection system in non-compliance with their respective National Pollutant Discharge Elimination System (NPDES) permits and in violation of the Clean Water Act.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and other issues identified in the report. If the item has already been addressed also please note that in your response. However, if these items require extensive repairs and/or capital investments, then the work shall be scheduled in consideration of other priorities and the details shall also be informed to EPA.

Also send a copy of your response to Wanda E. García Hernández, Director, Water Quality Area, EQB, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, Puerto Rico 00910

If you have any questions please feel free to contact Alex O. Rivera of my staff at 787-977-5845.

Sincerely,

aime Géliga

Chief

Municipal Water Program Branch

Caribbean Environmental Protection Division

Enclosure

cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB

Emma Blanco, PRASA Metro Region Compliance (via email)

William Díaz, PRASA Metro Region Compliance (via email)

Héctor Cepeda, PRASA Metro Region Compliance (via email)

Yanira Cosme, PRASA Metro Region Operations (via email)

Christie Mota, PRASA Metro Region San Juan Area Operations (via email)

Juan Pérez, PRASA (via email)

Alexander Ávila, MSJ (via email)

Maylene Pérez, MSJ (via email)

Maribel Medina, University of Puerto Rico (via email)



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JUN 1 0 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article Number: 7009 2250 0000 9163 5317

Noelia Y. Rosa Jaime

Director

Environmental Compliance and Planning Office

Autonomous Municipality of San Juan

P.O. Box 70179

San Juan, Puerto Rico 00936-8179

Irma López

Director

Compliance and Quality Control Directorate

Puerto Rico Aqueduct and Sewer Authority

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Sincerely,

Jaime Géliga

Chief

Municipal Water Program Branch

Caribbean Environmental Protection Division

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Maribel Medina, University of Puerto Rico (via email)



United States Environmental Protection Agency Washington, D.C. 20460 Water Compliance Inspection Report Form Approved.

OMB No. 2040-0057 Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)						
Transaction Code 1 N 2 3 P R 0 0 2 1 5 5 5 11 1		yr/mo/day 12 1 5 0 6 0 2 17		Inspection TypeInspectorFac Type 18-19 R 201		
21 U N N A C E P T A B L E			66			
Inspection Work Days Facility Self-Monitoring Evaluation Rating			QA	Reserved		
67 0 . 1 69	70 U	71	72	7374758	0	
Section B: Facility Data						
Name and Location of Facility Inspected (for indi- name and NPDES permit number	ustrial users discharging to POTW	Entry Time/Date Permit Effective Date				
PRASA Puerto Nuevo RWWTP Collection System (PR0021555)			9:15 AM June 2, 2015			
Venezuela Community Collection System			Exit Time/Date Permit Expiration Date			
				10:20 AM		
				June 2, 2015		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data - Other Responsible	Officials	
N/A						
1771						
Name, Address of Responsible Official/Title/F	Phone and Fax Number(s)			1		
Director						
PRASA Metro Region						
939-292-6690						
			Yes x No	1		
Section C: Areas Evaluated During Inspection (Check only to Permit Flow Measurement X Operations & Ma				Maintenance CSO/SSO (Sewer Overfle	ow)	
					OW)	
Records/Reports	Self-Monitoring Program		Sludge Handlin	g/Disposal Pollution Prevention		
Facility Site Review	Compliance Schedules		Pretreatment Multimedia			
Effluent/Receiving Water	Laboratory		Storm Water			
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Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)						
					8	
See Enclosed Report						
Name(s) and Signature(s) of Inspector(s)	0	Agency/Of	fice/Phone and Fax Nu	mbers Date		
				6/10/		
Alex O. Rivera, Environmental Engineer		U.S. EPA	Region 2-CEPD	- 787-977-5845 <u>rivera.alex@epa.s</u>	gov	
Signature of Management Q.A. Reviewer Agency/Office/Phone and Fax Numbers Date						
			A Region 2, CEI			
787-977-5840 geliga.ja						



United States Environmental Protection Agency Washington, D.C. 20460 Water Compliance Inspection Report Form Approved.

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Section A: National Data System Coding (i.e., PCS)						
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Section B: Facility Data Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW Entry Time/Date Permit Effective Date						
name and NPDES permit number	Entry Time/Date Permit Effective Date					
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Venezuela Community Collection System	Exit Time/Date Permit Expiration Date					
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	10:20 AM					
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N/A						
Name Address of Decree this Official Tills (Discounting A						
Name. Address of Responsible Official/Title/Phone and Fax Number(s) Noelia Y. Rosa Jaime		-				
Director						
Municipality of San Juan Environmental Compliar	nce					
and Planning Office						
787-787-480-2253	Contacted Yes x No					
	Tics X No					
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)						
Permit Flow Measurement	Operations & N	Maintenance CSO/SSO (Sewer Overflow)				
Records/Reports Self-Monitoring Program	Sludge Handlin	g/Disposal Pollution Prevention				
Facility Site Review Compliance Schedules	Pretreatment M	fultimedia				
X Effluent/Receiving Water Laboratory	X Storm Water					
Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)						
Section 21 Summary of Findings Comments (Amuel anamorus success of nurrante and electrists as necessary)						
See Enclosed Report						
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Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers Date					
Alan O. Birana Farrianna at I Farrianna	U.S. EPA Region 2-CEPD - 787-977-5845 rivera.alex@epa.gov					
Alex O. Rivera, Environmental Engineer	U.S. EPA Region 2-CEPD	- /6/-9//-3845 rivera.alex@epa.gov				
Signature of Management Q-A Reviewer	Agency/Office/Dhone and Eav No.	phers Date (12)				
Jaime Geliga, Chief, CEPD-MWPB	Agency/Office/Phone and Fax Numbers Date U.S. EPA Region 2, CEPD MWPB					
	787-977-5840 geliga.ja					

SUPPLEMENT TO WATER COMPLIANCE INSPECTION REPORT FORM (EPA FORM 3560-3 (REV 9-94))

VENEZUELA COMMUNITY WASTEWATER AND STORMWATER COLLECTION SYSTEMS

Reconnaissance Inspection: Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto

Nuevo Regional Wastewater Treatment Plant (RWWTP) NPDES

Permit (PR0021555)

Autonomous Municipality of San Juan (MSJ) Municipal Separate

Storm Sewer System (MS4)

National Pollutant Discharge Elimination System (NPDES) Permit

(PRR040036)

Location Address: Venezuela Community, San Juan, Puerto Rico

Coordinates: Lat. 18° 23' 36.92" N – Long. 66° 3' 15.50" W

Inspection Date: June 2, 2015

Inspector: Alex O. Rivera, Environmental Engineer

USEPA Region 2

Caribbean Environmental Protection Division

Municipal Water Program Branch (787) 977-5845 – rivera.alex@epa.gov

I. Background and inspection purpose:

On June 2, 2015, Alex O. Rivera of EPA Region 2 (Inspector) conducted a reconnaissance inspection (RI) of the wastewater and stormwater collection systems located in Venezuela Community (Venezuela) in San Juan, Puerto Rico. The inspection was performed to follow-up with the findings documented during a previous EPA RI conducted in May 26, 2015 in response to a citizen complaint received on May 18, 2015, related to wastewater discharges reaching the Río Piedras River from an outfall located in the University of Puerto Rico Botanical Garden South facility. During EPA's May 26, 2015 RI, wastewater discharges were documented reaching the Río Piedras River as alleged by the complainant. PRASA and MSJ were notified about the preliminary inspection findings via email on May 26, 2015.

The unnamed creek is a tributary of the Rio Piedras River that subsequently discharges into the San Juan Bay and the Atlantic Ocean.

Venezuela wastewater collection system is part of PRASA's Puerto Nuevo RWWTP collection system. MSJ nor PRASA were represented during the inspection. The inspection was performed pursuant to the authority in Section 308(a) of the CWA. The inspection took place from approximately 9:15 a.m. to 10:20 a.m., local time. Dry weather and cloudy skies prevailed during the inspection. All photos related to the items above were taken using a Nikon Coolpix P510 Digital Camera. Photos DSCN2221 to DSCN2241 were taken and included in **Attachment** I of this document. The EPA inspector contacted and notified PRASA official Christie Mota, San Juan Operations Supervisor, about the preliminary inspection findings via telephone on June 2, 2015 via telephone at 10:01 AM.

The San Juan Bay Estuary Program (SJBEP) was present during the inspection at represented by Mr. Omar Pérez.

II. Inspection Findings and Observations:

The findings and observations of the RI are included below:

- 1. An unnamed creek was found with wastewater characteristics (e.g., odor, color, and algae formation) and flowing in direction of the Río Piedras River. The EPA inspector observed the unnamed creek from a location south of the University of Puerto Rico Botanical Garden and adjacent to the Botanical Garden Security Offices. Coordinates: Lat. 18° 23' 37.44" N Long. 66° 3' 20.22" W. See photo DSCN2221 located in **Attachment I** for more details. Refer to EPAs May 26, 2015 RI Report for more details and photos of the discharge point into the Rio Piedras River.
- 2. The wastewater manhole that was documented overflowing by the SJBEP on May 22, 2015 and included as part of EPA May 26, 2015 inspection documentation, was found flowing normally. The wastewater manhole is located at Venezuela's Guaracanal Street (PR-847), south of La Experimental Residential Development Street #1. Coordinates: Lat. 18° 23' 27.71" N Long. 66° 3' 8.84" W. See photos DSCN2222 thru DSCN2224 located in **Attachment I** for more details. Refer to EPA May 26, 2015 RI Report for more details about the SJBEP May 22, 2015 findings.
 - During the inspection the EPA inspector noted that wastewater overflows occurrences in the above described wastewater manhole does not impact the unnamed creek described in item number 1. However, it does impact an additional creek that appears to be intermittent. The creek flows into the east part of the University of Puerto Rico Botanical Garden Property.
- 3. Significant amount of flow with wastewater characteristics (e.g., color, odor, solids, and algae formation) was observed in an unnamed creek located north of Venezuela's Amalia Marín Public School and south of Guaracanal (PR-847) and Izcoa Díaz Streets intersection. Coordinates: Lat. 18° 23' 36.68" N Long. 66° 3' 15.72" W. See photos DSCN2225, DSCN2226, and DSCN2233 located in **Attachment I** for more details.
- 4. A concrete circular pipe of approximately 24 inches was found underneath Guaracanal Street (PR-847) and discharging significant amount of wastewater into the unnamed creek described in item 3. Coordinates: Lat. 18° 23' 36.72" N Long. 66° 3' 15.73" W. See photos DSCN2230 to DSCN2232 located in **Attachment I** for more details.
- 5. A wastewater manhole located at Guaracanal (PR-847) and Izcoa Díaz Street intersection was found with high levels of sewage. Coordinates: Lat. 18° 23' 37.02" N Long. 66° 3' 15.80" W. See photos DSCN2227 and DSCN2228 located in **Attachment I** for more details.
- 6. A wastewater manhole located at Guaracanal Street (PR-847), southeast of the wastewater discharge described in item 4, and in front of Amalia Marín Public School, was found flowing normally and in direction of Guaracanal (PR-847) and Izcoa Díaz Street intersection. Coordinates: Lat. 18° 23' 34.79" N Long. 66° 3' 13.96" W. See photos DSCN2234 and DSCN2235 located in **Attachment I** for more details.

- 7. The wastewater collection system at Venezuela's Acueducto and Tanques Streets, parallel to Guaracanal (PR-847) Street was found flowing normally. See photos DSCN2236 to DSCN2239 located in **Attachment I** for more details.
- 8. The EPA inspector contacted by telephone PRASA official Christie Mota, San Juan Operations Supervisor, and informed the preliminary inspection findings on June 2, 2015 via telephone at 10:01 AM. PRASA official Christie Mota informed the EPA inspector that PRASA suspects that the wastewater collection system segment that crosses the unnamed creek, described in item 3, could be the source of the wastewater discharges. In addition, Mrs. Mota stated that PRASA was in the process of coordinating a closed-circuit television (CCTV) camera study to determine the problem. Ms. Mota also added and alleged that a few days prior to the call PRASA was able to reduce the levels in the wastewater manhole described in item 5, and the discharge was eliminated temporarily.
- 9. Large amount of drinking water were observed flowing into the stormwater sewer at Venezuela Brumbaugh Street. The flow was observed overflowing from the street near Brumbaugh and Callejón A Streets intersection. Coordinates: Lat. 18° 23' 42.44" N Long. 66° 3' 9.50" W. The situation was also informed to PRASA's Christie Mota by the EPA inspector during the June 2, 2015 10:01 AM telephone conversation. See photos DSCN2240 and DSCN2241 located in **Attachment I** for more details.

III. Conclusion

Wastewater is a pollutant as defined by Section 502(6) of the Clean Water Act (Act), 33 U.S.C. § 1362. The Río Piedras River and its tributaries are considered Waters of the United States as defined by the Act. Venezuela MS4 and PRASA's Wastewater Collection Systems are point sources as define by the Act. Venezuela Storm Water Collection System is an appurtenance of the MSJ and is a point source as define by the Act. Venezuela Wastewater Collection System is an appurtenance of PRASA and is a point source as define by the Act. Venezuela Wastewater Collection System discharge by gravity wastewater into MSJs MS4. MSJ and PRASA does not have an NPDES permit to discharge the pollutants (e.g. sewage, wastewater solids) that were observed in MSJ MS4.

MSJ and PRASA shall take the necessary actions to cease discharging wastewaters into Waters of the United States. The response to this report shall include all the details, evidence, and results of such actions.

End of Report

Report prepared by:

Eng. Alex O. Rivera

Environmental Engineer

Attachment I - Photo Log and Location Map

Dated: 6/10/15

Attachment I – EPA June 2, 2015 RI Report Photo Log and Location Map



DSCN2221 – Partial view of an unnamed creek was found with wastewater characteristics (e.g., odor, color, and algae formation) and flowing in direction of the Río Piedras River. The EPA inspector observed the unnamed creek from a location south of the University of Puerto Rico Botanical Garden and adjacent to the Botanical Garden Security Offices.



DSCN2222 – View of a wastewater manhole that was documented overflowing by the SJBEP on May 22, 2015 and included as part of EPA May 26, 2015 inspection documentation, was found flowing normally. The wastewater manhole is located at Venezuela's Guaracanal Street (PR-847), south of La Experimental Residential Development Street #1.



DSCN2223 – Additional view of a wastewater manhole that was documented overflowing by the SJBEP on May 22, 2015 and included as part of EPA May 26, 2015 inspection documentation, was found flowing normally. The wastewater manhole is located at Venezuela's Guaracanal Street (PR-847), south of La Experimental Residential Development Street #1.



DSCN2224 – View of a inner part of the wastewater manhole is located at Venezuela's Guaracanal Street (PR-847), south of La Experimental Residential Development Street #1.



DSCN2225 – View of an unnamed creek located north of Venezuela's Amalia Marín Public School and south of Guaracanal (PR-847) and Izcoa Díaz Streets intersection. Significant amount of flow with wastewater characteristics (e.g., color, odor, solids, and algae formation) was observed.



DSCN2226 – Additional view of an unnamed creek located north of Venezuela's Amalia Marín Public School and south of Guaracanal (PR-847) and Izcoa Díaz Streets intersection. Significant amount of flow with wastewater characteristics (e.g., color, odor, solids, and algae formation) was observed.

Attachment II: EPA June 2, 2015 Reconnaissance Inspection at Venezuela Community Storm Water and Wastewater Collection Systems - Photo Log and Location Map



DSCN2227 – View of the inner part of a wastewater manhole located at Guaracanal (PR-847) and Izcoa Díaz Street intersection. The wastewater manhole was found with high levels of sewage.



DSCN2228 – Additional view of a wastewater manhole located at Guaracanal (PR-847) and Izcoa Díaz Street intersection. The wastewater manhole was found with high levels of sewage.



DSCN2229 – Partial view of the inner part of a stormwater inlet located near the Guaracanal (PR-847) and Izcoa Díaz Streets intersection. The inlet is located upstream of the unnamed creek found with wastewater presence.



DSCN2230 – View of a concrete circular pipe of approximately 24 inches was found underneath Guaracanal Street (PR-847) and discharging significant amount of wastewater into the unnamed creek described in photo DSCN2225 and DSCN2226.



DSCN2231 – Additional view of a concrete circular pipe of approximately 24 inches was found underneath Guaracanal Street (PR-847) and discharging significant amount of wastewater into the unnamed creek described in photo DSCN2225 and DSCN2226.



DSCN2232 – Additional view of a concrete circular pipe of approximately 24 inches was found underneath Guaracanal Street (PR-847) and discharging significant amount of wastewater into the unnamed creek described in photo DSCN2225 and DSCN2226.



DSCN2233 – Additional view of an unnamed creek located north of Venezuela's Amalia Marín Public School and south of Guaracanal (PR-847) and Izcoa Díaz Streets intersection.

Significant amount of flow with wastewater characteristics (e.g., color, odor, solids, and algae formation) was observed.



DSCN2234 – View of the inner part of a wastewater manhole located at Guaracanal Street (PR-847), southeast of the wastewater discharge into the unnamed creek, and in front of Amalia Marín Public School. The manhole was found flowing normally and in direction of Guaracanal (PR-847) and Izcoa Díaz Street intersection.

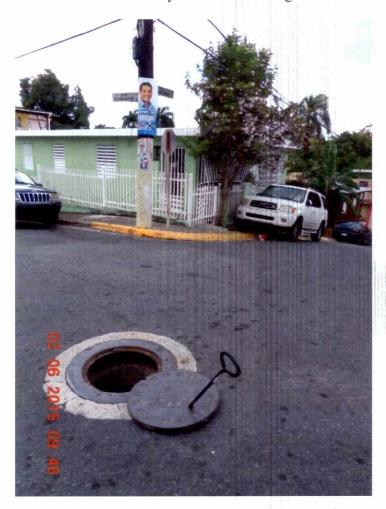


DSCN2235 – View of a wastewater manhole located at Guaracanal Street (PR-847), southeast of the wastewater discharge into the unnamed creek, and in front of Amalia Marín Public School. The manhole was found flowing normally and in direction of Guaracanal (PR-847) and Izcoa Díaz Street intersection.



DSCN2236 – View of the inner part of a wastewater manhole located at Venezuela Community Izcoa Díaz and Acueducto Streets intersection.

02.06.2015 09:45



DSCN2237 – View of a wastewater manhole located at Venezuela Community Izcoa Díaz and Acueducto Streets intersection.



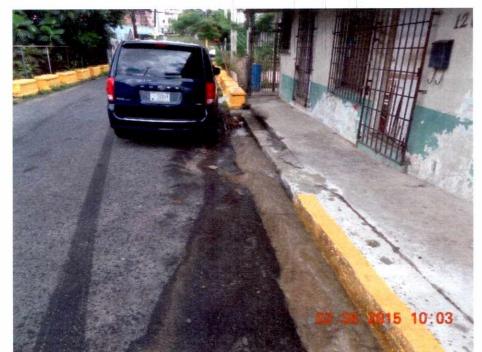
DSCN2238 – View of the inner part of a wastewater manhole located at Venezuela Community Acueducto Street.



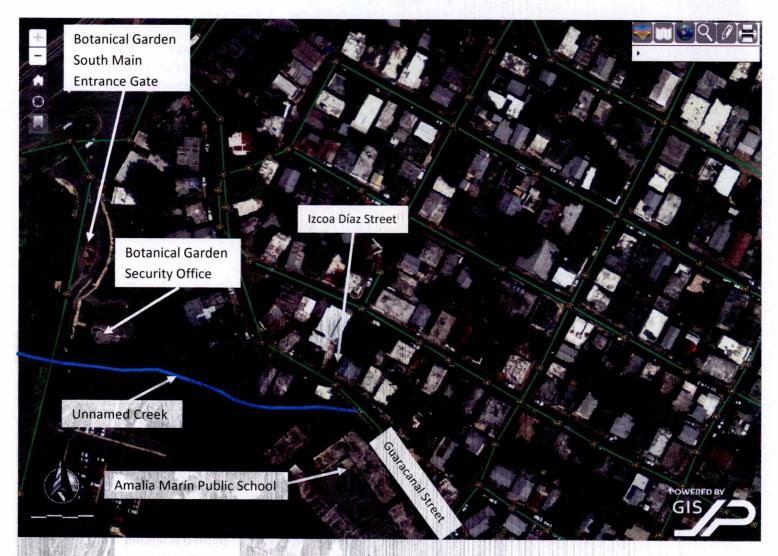
DSCN2239 – View of a wastewater manhole located at Venezuela Community Acueducto Street.



DSCN2240 – View of an apparent drinking water broken line causing a large discharge into the stormwater sewer at Venezuela Brumbaugh Street. The flow was observed near Brumbaugh and Callejón A Streets intersection.

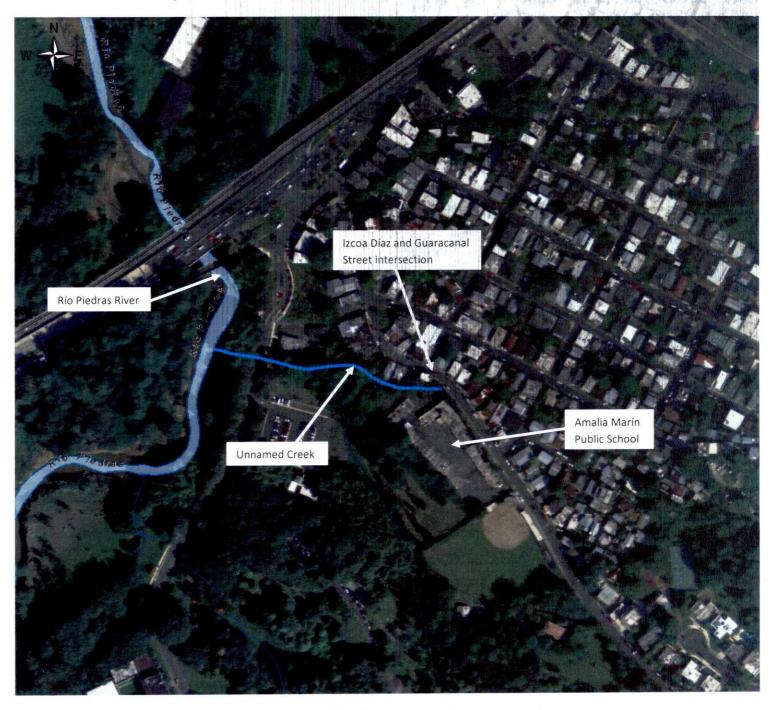


of an apparent drinking water broken line causing a large discharge into the stormwater sewer at Venezuela Brumbaugh Street. The flow was observed near Brumbaugh and Callejón A Streets intersection.



Source: Puerto Rico Planning Board GIS Application (http://gis.ip.pr.gov/mipr/)

Attachment II: EPA June 2, 2015 Reconnaissance Inspection at Venezuela Community Storm Water and Wastewater Collection Systems - Photo Log and Location Map



Source: Puerto Rico Planning Board GIS Application (http://gis.otg.pr.gov/apps/pr map/)